



April 15, 2016

VIA E-MAIL ONLY

Mr. Jason Lynch – Jason.Lynch@dot.wi.gov
WisDOT
141 N.W. Barstow St.
Waukesha, WI 53187

RE: Final Environmental Impact Statement – I-94 East-West Corridor Study

Dear Mr. Lynch:

Wisconsin Infrastructure Investment Now, Inc. (WIIN) is a nonprofit organization, and its mission is to educate the public, elected officials and regulators on the societal and economic benefits of the responsible investment in, and expansion of, transportation facilities, renewable and traditional energy projects, mining and other infrastructure projects. WIIN has reviewed the Final Environmental Impact Statement (Final EIS) for the I-94 East-West Corridor Study (the Project) proposed by Wisconsin Department of Transportation (WDOT). WIIN appreciates the opportunity to submit comments on the Final EIS.

WIIN's contributors and supporters include organizations and individuals that reside and/or work in the Project area and will be impacted by the proposed highway project. WIIN has industry knowledge that further supports the Department's findings in Section 1 of the Final EIS, Purpose and Need for the Project.

A recent study released by the U.S. Department of Transportation found that 71% of Wisconsin's roads are in poor or mediocre condition and 14% of Wisconsin's bridges are structurally deficient or functionally obsolete.¹ The American Society of Civil Engineers'

¹U.S. DOT Road and Bridge Data by State, available at <https://www.transportation.gov/policy-initiatives/grow-america/road-and-bridge-data-state> (last visited April 12, 2016).

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(ASCE) most recent report card gave road quality in the United States a “D” grade.² The Wisconsin Taxpayer Alliance’s report card rated Wisconsin’s highway condition as a “D.”³ A recent analysis by the Wisconsin County Highway Association supports the findings of the U.S. DOT, the ASCE and the Wisconsin Taxpayer Alliance.⁴ This data further supports the information in the Final EIS concerning the condition and deficiencies (§ 1.3.4), current and projected traffic volumes and congestion (§§ 1.3.1 and 1.3.5), and crash rates (§ 1.3.3) of the interstate in the Project area.

Well-maintained and functional highways and bridges are necessary for people and goods to access the markets and services and are a critical component to economic stability and growth in Wisconsin.⁵ A recent study released by ASCE concluded that “the nation’s surface transportation infrastructure is failing to sustain the economy.”⁶ One of the largest contributing factors to this failure is deficient pavement. According to the ASCE, “31% of the nation’s vehicle miles of travel use deficient pavement, resulting in higher vehicle operating costs and lower safe travel speeds for all vehicles, and creating the potential for damaged goods moved by truck, or longer routings for trucks in cases where trucks must be detoured due to pavement weight restrictions.”⁷ Additionally, “18% of the nation’s vehicle miles of travel occur on roads without sufficient capacity to carry current traffic levels. Congestion is considered part of the impact of infrastructure deterioration because it results from designs that were adequate for past levels of traffic but can no longer support the intended level of service. Congestion affects both the speed and reliability of highways for cars and trucks, imposing the costs of additional travel time, higher operating costs due to operating cars and trucks in stop-go conditions, and the interruption in business operations due to less reliable overall travel times.”⁸ The Great Lakes Region, of which Wisconsin is a part, has slightly higher vehicle miles of travel using deficient

² American Society of Civil Engineers, 2013 Report Card for America’s Infrastructure, available at <http://www.infrastructurereportcard.org/> (last visited April 12, 2016).

³ Wisconsin Taxpayers Alliance 2015 Report Card, available at <http://cdn.p2a.co/49430/HmTowho4iN1452717209QWEZmeJ2G3> (last visited April 12, 2016).

⁴ See WCA and WCHA Respond to Wisconsin Department of Transportation Comments on Statewide Road Conditions (March 17, 2016), available at http://www.thewheelerreport.com/wheeler_docs/files/0317wcha.pdf (last visited April 12, 2016).

⁵ Wis. Stat. § 1.11(2)(c)6. (Consideration of economic advantages and disadvantages of the Projects is a required aspect of any Wisconsin Environmental Protection Act (WEPA) review).

⁶ ASCE, Failure to Act: The Economic Impact of Current Investment Trends in Surface Transportation Infrastructure, p. 8, available at http://www.asce.org/uploadedFiles/Issues_and_Advocacy/Our_Initiatives/Infrastructure/Content_Pieces/failure-to-act-transportation-report.pdf (last visited April 12, 2016).

⁷ *Id.* at p. 10.

⁸ *Id.* at p. 12.

pavement, at 32%.⁹ As indicated in the Final EIS, the condition of the current roadway (§ 1.3.4) and current and projected traffic volumes and congestion (§§ 1.3.1 and 1.3.5) demonstrate the need for the Project.

Deficient pavement impacts not only travel time, delivery of goods, and the operating costs of vehicles, but also the economy as a whole. “By 2040, it is estimated that Americans will be earning a total of \$252 billion less than would have been possible if all infrastructure had been sufficient.”¹⁰ Furthermore, “[t]he operating, reliability, travel time, safety, and environmental costs of a deficient transportation system affect the cost structure and competitiveness of firms operating in the U.S. Due to costs imposed by deficient infrastructure, in 2020 the U.S. economy is expected to export \$28 billion less in goods than would have been the case with sufficient infrastructure, and in 2040 exports are expected to be \$72 billion less.”¹¹ The ASCE’s conclusions are further supported by Area Development Magazine’s annual survey that has consistently ranked highway accessibility as one of the most significant factors influencing businesses decisions to locate or relocate.¹²

The Center on Budget and Policy recently released a study on the economic impact of proper infrastructure investment, like the Project:

The investment will improve state economies, now and in the future. Higher-quality and more efficient infrastructure will boost productivity in states that make the needed investments, lifting long-term economic growth and wages. In the short term, even though employment is recovering, millions of Americans are working less than they would like and making less than it takes to get by. Key infrastructure investments would provide immediate job opportunities.¹³

In order for Wisconsin to continue to support and grow its economy, investment in infrastructure, such as the Project, is needed.

⁹ *Id.* at Table 8.

¹⁰ *Id.* at p. 15.

¹¹ *Id.*

¹² Area Development Magazine, 12th Annual Consultants Survey: Clients’ Robust New Facility/Expansion Plans Revealed, Chart X (highway accessibility ranked No. 1 in 2014 and No. 6 in 2015), available at <http://www.areadevelopment.com/Corporate-Consultants-Survey-Results/Q1-2016/consultants-reveal-client-site-selection-facility-plans-8262.shtml> (last visited April 12, 2016).

¹³ Center on Budget and Policy Priorities, *It’s Time for States to Invest in Infrastructure* (Feb. 23, 2016), available at, <http://www.cbpp.org/research/state-budget-and-tax/its-time-for-states-to-invest-in-infrastructure> (last visited April 12, 2016).

WIIN appreciates the opportunity to provide comments on the Final EIS. If the Department has any questions concerning WIIN's submission, please contact me at your convenience.

Sincerely yours,

/s/ Terry McGowan

Terry McGowan
President